

HALPRIN, TEMPLE, GOODMAN & SUGRUE

1100 NEW YORK AVENUE, N.W., SUITE 650 EAST
WASHINGTON, D.C. 20005

(202) 371-9100 TELEFAX: (202) 371-1497

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

ALBERT HALPRIN
RILEY K. TEMPLE
STEPHEN L. GOODMAN
MELANIE HARATUNIAN
WILLIAM F. MAHER, JR.
THOMAS J. SUGRUE

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JOEL BERNSTEIN
DAVID E. COLTON*
JUSTIN W. LILLEY
J. RANDALL COOK
*ADMITTED N.Y. & PA.

November 4, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: Motion for Enlargement of Page Limit
CC Docket No. 96-98

Dear Mr. Caton:

The Local Exchange Carrier Coalition, by its counsel, hereby files a Motion for Enlargement of Page Limit of replies to oppositions to petitions for reconsideration in the above captioned proceeding. Enclosed is a signed original motion with 11 copies. Also enclosed is a copy to be stamped and returned with our messenger.

Please do not hesitate to contact the undersigned with any comments or questions.

Sincerely,

William F. Maher, Jr.
William F. Maher, Jr.

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Implementation of the Local Competition
Provisions in the Telecommunications Act
of 1996)

CC Docket No. 96-98

Interconnection between Local Exchange
Carriers and Commercial Mobile Radio
Service Providers)

CC Docket No. 95-185

MOTION FOR ENLARGEMENT OF PAGE LIMIT

The Local Exchange Carrier Coalition ("LECC") respectfully requests that the Commission waive the 10-page limitation of Section 1.429(g) of its Rules for replies to oppositions filed in response to petitions for reconsideration of the First Report and Order (the "First Order") in the above-captioned proceeding.^{1/} LECC requests the Commission to enlarge the page limit to 20 double-spaced pages for replies to such oppositions. LECC also requests that the Commission clarify that empirical economic studies and copies of relevant state orders will not be counted against the page limit established by the Commission.

LECC consists of incumbent local exchange carriers ("LECs") that provide telecommunications services to residential and business customers in rural, urban, and

^{1/} See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, FCC 96-325 (rel. Aug. 8, 1996).

suburban areas throughout the United States. LECC filed a petition for reconsideration and clarification of the First Order on September 30, 1996.^{2/}

The requested enlargement of the page limit for replies is necessary for LECC to address fully the oppositions filed in this reconsideration proceeding. The Common Carrier Bureau has already increased the 25-page limits for petitions for reconsideration as well as oppositions to 50 double-spaced pages.^{3/} In doing so, the Bureau noted that the length of the First Order and the complexity of the issues presented "may require greater discussion than the typical Commission order."^{4/} Parties confirmed this conclusion by addressing at length in their petitions and oppositions numerous complex issues raised by the First Order. As a matter of procedural fairness, the requested enlargement of the page limit for replies is consistent with the preceding enlargements.

An increased page limit for replies will serve the public interest by ensuring that parties have the opportunity to compile a complete record in the Commission's reconsideration of the First Order. At least 35 parties have filed oppositions to or comments on the petitions, and most of these discuss important issues raised in LECC's petition, including transport and termination, network unbundling, collocation, pricing, resale obligations, reciprocal compensation, and attachments to poles, conduits, and rights of way. The implementation of Sections 251 and 252 of the Telecommunications Act of 1996 will have major and unique impacts on end users as well as the telecommunications industry.

^{2/} The members of LECC are listed in Attachment A to the LECC petition.

^{3/} See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, Order, CC Docket No. 96-98, DA 96-1603 (Com. Car. Bur. rel. Sept. 24, 1996) (enlarging page limit for petitions for reconsideration); Order, CC Docket No. 96-98, DA 96-1764 (Com. Car. Bur. rel. Oct. 25, 1996) (enlarging page limit for oppositions).

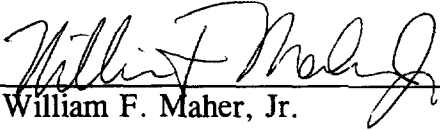
^{4/} Id. at para. 2.

Accordingly, there is good cause for enlarging the page limit for replies in these circumstances.

WHEREFORE, LECC respectfully requests that the Commission waive Section 1.429(g) of its Rules and enlarge the page limit for replies to 20 double-spaced pages, while clarifying that empirical economic studies and copies of relevant state orders will not be counted against the page limit established by the Commission.

Respectfully submitted,

The Local Exchange Carrier Coalition

By: 
William F. Maher, Jr.
David Colton
Halprin, Temple, Goodman & Sugrue
1100 New York Avenue, N.W.
Suite 650 East
Washington, D.C. 20005
202/371-9100

Its Attorneys

November 4, 1996

CERTIFICATE OF SERVICE

I, Carmen Santana-Lee, a secretary at the law firm of Halprin, Temple, Goodman & Sugrue, do hereby declare that I have caused copies of the Motion for Enlargement of Page Limit of the Local Exchange Carrier Coalition ("LECC"), to be hand delivered this 4th day of November, 1996 to:

Regina Keeney
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

Richard Welch
Chief, Policy & Program Planning
Division, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 544
Washington, D.C. 20554

Carol Matthey
Deputy Chief, Policy & Program
Planning Division, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 544
Washington, D.C. 20554

Donald Stockdale
Policy & Program Planning Division,
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 544
Washington, D.C. 20554

Janice Myles
Policy & Program Planning Division,
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 544
Washington, D.C. 20554

James Schlichting
Chief, Competitive Pricing Division,
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 518
Washington, D.C. 20554

John Nakahata
Office of the Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

James Casserly
Office of Commissioner Ness
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554

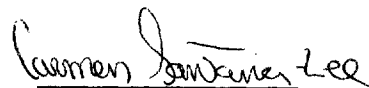
Daniel Gonzales
Office of Commissioner Chong
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

James Coltharp
Office of Commissioner Quello
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554

Richard Metzger
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

James Keegan
Federal Communications Commission
Office of Engineering and Technology
Room 423
2000 M Street, N.W.
Washington, D.C. 20054

Gregory Rosston
Federal Communications Commission
1919 M Street, N.W., Room 822
Washington, D.C. 20554


Carmen Santana-Lee